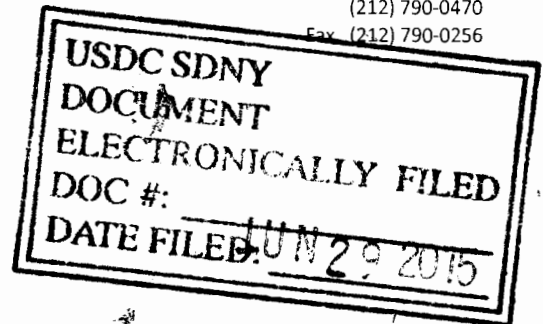


CARDOZO LAW
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June 25, 2015

SO ORDERED

The initial conference is adjourned
to November 3, 2015 at 9:30 a.m.

BY ECF AND FACSIMILE

The Honorable George B. Daniels
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007-1312

JUN 29 2015

George B. Daniels
HON. GEORGE B. DANIELS

Re: *Krieg v. City of New York, et al.*, No. 15-cv- 03626 (GBD)(HBP)
Plaintiff and Defendants' joint proposal on scheduling

Dear Judge Daniels:

We represent the Plaintiff, Christopher Krieg, in the above-listed matter and write jointly with Defendants' counsel regarding the Court's May 26, 2015 Order directing the parties to confer about scheduling. The parties have so conferred and jointly seek that this case proceed under Local Rule 83.10 (Plan for Certain § 1983 cases against the City of New York or "The Plan").

The Plaintiff brings this action against the City of New York and individually named NYPD officers alleging constitutional violations under 42 U.S.C. § 1983 as well as violations of the Americans with Disabilities Act and Section 504 of the Rehabilitation Act based on acts arising from the arrest, transportation, and detention of the Plaintiff, who is paraplegic. This case was transferred to this district from the Eastern District (M.J. Bloom) on May 6, 2015 and assigned to Your Honor on June 2, 2015. Plaintiff filed his Second Amended Complaint on June 15, 2015.

Counsel for the parties have conferred and agree that this case may proceed under The Plan. According to the Parties' agreed-upon schedule, Defendants will file their Answer on August 28, 2015. All subsequent deadlines under The Plan flow from the date the Answer is filed, and the parties agree to abide by all deadlines laid out in The Plan. For example, limited

discovery under the Plan will be produced by September 25, 2015, Plaintiff's demand letter by October 9, Defendants' response to the demand by October 23 and a mediation session to occur no later than December 4, 2015.

Should the Court endorse the parties' request to place this case in The Plan, including the proposed schedule, the parties consent to the adjournment of the Initial Conference currently scheduled for July 14, 2015 at 9:30 a.m. Should the Court still wish to hold the conference, all parties remain available.

We thank the Court in advance for its consideration.

Respectfully submitted,

_____/s/
Betsy Ginsberg
Daniel Sternberg

cc: **BY ECF**
Matthew Bridge
Assistant Corporation Counsel
New York City Law Department
100 Church Street
New York, NY 10007